

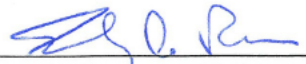
## MEMO ENDORSED

December 18, 2023

**Via ECF**

The Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

The application is X granted  
\_\_\_\_\_ denied

  
Edgardo Ramos, U.S.D.J.

Dated: December 19, 2023  
New York, New York

**Re: Letter Motion for Approval to Seal portions of plaintiffs' amended complaint in *Louisiana Health Service & Indemnity Company et al v. Celgene Corporation et al* (1:23-cv-07871-ER)**

Dear Judge Edgardo Ramos:

We write on behalf of the plaintiffs in the above-captioned litigation. Pursuant to Your Honor's Individual Practice 3.II, a letter motion must be filed electronically through the court's ECF system in conformity with the Court's standing order.

On September 7, 2023, the plaintiffs filed their original complaint. On December 11, 2023, the parties filed a joint stipulation stating, among other things, plaintiffs' intent to file an Amended Complaint on or before December 18, 2023. *See* ECF 64-5.

The plaintiffs request that portions of their amended complaint (filed contemporaneously with this motion) be sealed. The complaint includes references to agreements between Celgene and other entities that it produced on a highly confidential outside council eyes only basis.

We appreciate Your Honor's attention to this matter.

Respectfully submitted,

Thomas M. Sobol

/s/ Thomas M. Sobol

*Counsel for Louisiana Health Service & Indemnity  
Company d/b/a/ Blue Cross and Blue Shield of  
Louisiana, HMO Louisiana, Inc., David Mitchell, and the  
proposed class and subclasses*

cc: Counsel of record (via ECF)